REMARKS

Claims 1, 3-7 and 9-11 are all the claims pending in the application.

In summary, the Examiner has substantially maintained the previous prior art rejections.

Claims 1, 4-7, 10, and 11 are rejected under 35 U.S.C. § 103(a) as allegedly being

unpatentable over Prandoni et al. (U.S. Patent 7,042,493) in view of Tam et al. (U.S. Patent

5,754,186), and further in view of Dempski et al. (U.S. Publication 2004/0155902 A1). Claims 3

and 9 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Prandoni et al.

(U.S. Patent 7,042,493), Tam et al. (U.S. Patent 5,754,186) and further in view of Seedholm,

Peter, "Print Screen Button Tutorial"

(http//www.ibiblio.org/virtualcell/Tutor1/TandR/prtscr.html), hereinafter referred to as

Seedholm.

§ 103(a) Rejections (Prandoni / Tam / Dempski) - Claims 1, 4-7, 10, and 11
Claims 1, 4-7, 10 , and 11 are rejected over the combination of Prandoni, Tam, and

Dempski based on the reasons set forth on pages 2-12 of the present Office Action. Applicants

traverse these rejections at least based on the following reasons.

First, Applicants maintain the previously submitted argument that the applied references,

either alone or in combination, do not disclose or suggest at least, "an image control section that

… periodically extracts the drawn input image as input drawing static information at intervals of

the predetermined time," as recited in claim 1, and similarly recited in independent claims 7, 10,

and 11.

In the Office Action, the Examiner acknowledges that Prandoni does not satisfy the

above-quoted feature of claim 1, however the Examiner alleges that Tam makes up for this

particular deficiency of Prandoni. Specifically, the Examiner alleges that Tam satisfies the

above-quoted feature because a "received pen input establishes every predetermined time in Tam et al. which is consistent with the teachings of Prandoni et al., whom teaches performing image extraction based upon user-defined triggering events (i.e., user clicks of the mouse)." In response, Applicants submit that clicks of the mouse by a user or user-based pen input does not correspond to the specific feature of <u>periodically</u> extracting a drawn input image as input drawing static information at <u>intervals of a predetermined time</u>. Nowhere do any of the applied references, including Tam in particular, disclose or suggest at least the above-emphasized feature of claim 1. That is, Applicants acknowledge that Tam may disclose user-involved <u>manual</u> input based on a pen/stylus, however the specific feature with respect to the <u>periodic</u> extraction of a drawn input image as input drawing static information at <u>intervals of a predetermined time</u> are nowhere even mentioned in Tam or any of the other applied references.

Further, Applicants submit the following remarks which demonstrate the patentability of the claimed invention over the applied references.

Prandoni is directed to "stroboscoping process". Dempski is directed to "computer system in a teleconferencing environment". Applicants submit that the combination of Prandoni and Dempski would not have produced "a drawing processing apparatus <u>of a telecommunications system</u>.

Claim 1 recites, in part, that <u>the static image information is periodically cutout and the input drawing static information is periodically extracted at intervals of the predetermined time</u> (ΔT) and that <u>the predetermined time (ΔT) is set to be greater than or equal to the processing time (Δt) of the drawing processing apparatus consumed from a timing when the selected image is cut out to a timing when the combined image information is displayed on the display section.</u>

Further, Claim 1 is directed to "a drawing processing apparatus <u>of a telecommunications</u> <u>system</u> (Claim 1)", and the telecommunications system includes "a plurality of participant terminals". Here, the predetermined time (ΔT) can be set based on the processing time (Δt) unavoidably consumed by the apparatus from when the selected image is cut out until when the combined image information is displayed. That is, the predetermined time (ΔT) can be set based on the performance of the apparatus.

Consequently, an exemplary result of the claimed invention is that even when a low-performance apparatus is used as the apparatus, the combined image information can be smoothly displayed.

Contrary, the combination of Prandoni and Dempski would have only produced a telecommunications system merely capable of performing stroboscoping processing.

When a low-performance apparatus is used in an Prandoni-Dempski telecommunication system, not only would the performance-saving operation as performed in the claimed invention not have been performed, the displaying performance would have been further dissipated since it is unnecessarily enabled to perform the stroboscoping process.

Yet further, Applicants maintain that one of ordinary skill in the art, using common sense, would not have combined Prandoni with Tam. Prandoni is directed to automated stroboscoping of video sequences; stroboscoping relates to the analysis of fast motions. A stroboscope can be used in a video camera; for example, to attain a stroboscope sequence. Tam, on the other hand, is directed to a pen/stylus based computer system for blending static images, including an image that has been input by a stylus, into one image.

4

Yet even further, Applicants maintain that one of ordinary skill in the art, having

common sense at the time of invention (*see KSR International v. Teleflex Inc., where the*

Supreme Court suggests a more common sensical approach to the determination of

obviousness), would NOT have been led to take one alleged aspect of a pen/stylus device and

incorporate it into a very different technology area of stroboscoping, to arrive at the present

invention. Applicants submit that the Examiner has utilized substantial impermissible hindsight

reasoning in combining the applied references and coming to his conclusions. Applicants submit

that "common sense" dictates that the claimed invention would not have been obvious in view of

the combination of the applied references, at least because the applied references are directed to

such vastly different inventions that one of ordinary skill in the art would NOT have combined

Prandoni with Tam. At least based on the foregoing, Applicants submit that independent claim 1

is patentably distinguishable over the applied references.

Applicants submit that independent claims 7 and 10 are patentable at least based on

reasons similar to those set forth above with respect to claim 1.

Applicants submit that claims 4-6 and 11 are patentable at least by virtue of their

respective dependencies from claims 1 and 10.

§ 103(a) Rejections (Prandoni / Tam / Dempski / Seedholm) - Claims 3 and 9

Applicants submit that claims 3 and 9 are patentable at least by virtue of their respective

dependencies from independent claims 1 and 7. Seedholm does not make up for the deficiencies

of the other applied references.

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.
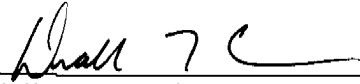
Respectfully submitted,

SUGHRUE MION, PLLC   Diallo T. Crenshaw
Telephone: (202) 293-7060   Registration No. 52,778
Facsimile: (202) 293-7860

WASHINGTON DC SUGHRUE/265550

65565

CUSTOMER NUMBER

Date: December 29, 2008